**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
FTX TRADING LTD., *et al.*,[1]	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)
ALAMEDA RESEARCH LLC, FTX TRADING LTD., WEST REALM SHIRES, INC., AND WEST REALM SHIRES SERVICES INC. (D/B/A FTX.US),	
Plaintiffs,	
v.	Adv. Pro. No. 23-50419 (JTD)
DANIEL FRIEDBERG,	
Defendant.	**Adv. Ref. Nos. 1, 6, 8, 10, 14, 15**

CERTIFICATION OF COUNSEL

I, Matthew B. McGuire, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the "Debtors"), hereby certify as follows to the best of my knowledge, information and belief:

1.   On June 22, 2023, the Plaintiffs initiated the above-captioned adversary proceeding by filing the *Complaint* [Adv. D.I. 1] (the "Complaint") in the above-captioned adversary proceeding against Defendant Daniel Friedberg (the "Defendant" and, together with the Plaintiffs, the "Parties").

---

[1]   The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

2.   On July 7, 2023, the Defendant executed a *Waiver of the Service of Summons* [Adv. D.I. 6], agreeing to accept and waive his objections, if any, to service of process. The Defendant's deadline to respond to the Complaint was September 15, 2023.

3.   On September 27, 2023, the Plaintiffs filed the *Stipulation for an Extension of Time for Defendant to Respond to Complaint* [Ad. D.I. 8], extending the Defendant's deadline to respond to the Complaint to October 4, 2023.

4.   On October 6, 2023, the Court entered the *Order Approving Second Stipulation for Extension of Time for Defendant to Respond to Complaint* [Adv. D. I. 10], extending the Defendant's deadline to respond to the Complain to October 20, 2023.

5.   On October 20, 2023, Defendant filed (a) *Defendant's Answer, Affirmative Defenses, and Counterclaims* [Adv. D.I. 14] (the "Answer and Counterclaims"); and (b) *Defendant's Motion to (A) Dismiss Plaintiffs' Counts IX and X Partially and (B) Dismiss Plaintiffs' Count XI in its Entirety* [Adv. D.I. 15] (the "Motion to Dismiss").

6.   The Parties have conferred regarding an agreement on the briefing schedule and response deadline for the Answer and Counterclaims and the Motion to Dismiss, as further detailed in a stipulation (the "Stipulation").

7.   The Stipulation and a proposed order approving the Stipulation (the "Order") are attached hereto as **Exhibit 1** (the "Stipulation and Order").

8.   Accordingly, the Parties respectfully request that the Bankruptcy Court enter the Stipulation and Order at its earliest convenience.

Dated: November 3, 2023
      Wilmington, Delaware

LANDIS RATH & COBB LLP

/s/ Matthew B. McGuire
Adam G. Landis (No. 3407)
Matthew B. McGuire (No. 4366)
Kimberly A. Brown (No. 5138)
Matthew R. Pierce (No. 5946)
919 Market Street, Suite 1800
Wilmington, Delaware 19801
Telephone: (302) 467-4400
Facsimile: (302) 467-4450
E-mail: landis@lrclaw.com
      mcguire@lrclaw.com
      brown@lrclaw.com
      pierce@lrclaw.com

-and-

SULLIVAN & CROMWELL LLP
Steven L. Holley (admitted *pro hac vice*)
Andrew G. Dietderich (admitted *pro hac vice*)
Brian D. Glueckstein (admitted *pro hac vice*)
Christopher J. Dunne (admitted *pro hac vice*)
Jacob M. Croke (admitted *pro hac vice*)
Hilary M. Williams (admitted *pro hac vice*)
125 Broad Street
New York, NY 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588
E-mail: holleys@sullcrom.com
      dietdericha@sullcrom.com
      gluecksteinb@sullcrom.com
      dunnec@sullcrom.com
      crokej@sullcrom.com
      williamsh@sullcrom.com

Counsel for the Debtors
and Debtors-in-Possession